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9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 JOSEPH PATRICK CURRY,

15 Defendant.

CR-07-0120-EFS

Government's Sentencing
Memorandum

16 Plaintiff, United States of America, by and through Michael C. Ormsby,
17 United States Attorney for the Eastern District of Washington, and Aine Ahmed,
18 Assistant United States Attorney for the Eastern District of Washington,
19 respectfully responds to the Presentence Investigation Report ("PSIR") as follows.

20 First, the Government has no objections to the PSIR. However, the
21 Government recommends that the Court accept the Plea Agreement, filed pursuant
22 to Fed.R.Crim.P. 11(c)(1)(C) wherein the Government and Defendant jointly
23 recommend a sentence of incarceration of one-hundred and two (102) months
24 followed by three (3) years of supervised release. The Defendant has successfully
25 completed a safety valve interview. While the relevant conduct is factually correct
26 as contained in the PSIR, the Plea Agreement recommends a reasonable sentence

1 based on readily provable conduct, without the necessity of calling reluctant
2 witnesses at a trial.

3 DATED May 3, 2011.

4 Michael C. Ormsby
5 United States Attorney

6 /s Aine Ahmed

7 Aine Ahmed
8 Assistant United States Attorney

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11 I hereby certify that on May 3, 2011, I electronically filed the foregoing
12 with the Clerk of the Court using the CM/ECF System which will send
13 notification of such filing to the following, and/or I hereby certify that I have
14 mailed by United States Postal Service the document to the following non-
15 CM/ECF participant(s)::

16 Mr. Christian Phelps
17 Attorney at Law
18 422 W. Riverside, Suite 518
19 Spokane, Washington 99201

20 s/ Aine Ahmed

21 Aine Ahmed
22 Assistant United States Attorney
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